

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

CIVIL ACTION NO. 05-11803-MLW

SHENIA DANCY-STEWART as  
Administratrix of the Estate of EVELINE  
BARROS-CEPEDA,  
Plaintiffs,

v.

THOMAS TAYLOR, Jr., and the CITY  
OF BOSTON,  
Defendants.

**DEFENDANTS' ASSENTED-TO MOTION  
FOR ONE BUSINESS DAY EXTENSION OF TIME TO FILE DEFENDANTS'  
MOTIONS FOR SUMMARY JUDGMENT**

Defendants, City of Boston and Boston Police Officer Thomas Taylor ("Defendants"), hereby move for a brief one (1) business day extension of time to file their motions for summary judgment. If Defendants' Motion for Extension is allowed, the Defendants' motions would be filed on or before Monday, June 2, 2008. In support of the instant motion, the Defendants state as follows:

1. Counsel for the Plaintiff assents to this Motion for Extension of Time.
2. Counsel for the Defendants fully expected to complete their motions for summary judgment by Friday, May 30, 2008, however, unexpected involvement in other matters has caused Counsel to come to the realization that additional time will be necessary to fully prepare the Defendants' motions for summary judgment.
3. Defendants' Counsel needs and requests a short one (1) business day extension to complete the Defendants' motions.
4. Allowing this motion will not prejudice any party to the action and permitting the Defendants an extension will further the interests of justice.

WHEREFORE, the Defendants respectfully request that this Court grant the instant Assented-to motion for a one (1) day extension of time, or until Monday, June 2, 2008, to file Defendants' motions for summary judgment.

Respectfully submitted,  
DEFENDANTS, THOMAS TAYLOR, JR.  
AND CITY OF BOSTON,

By their attorneys:

/s/ Helen G. Litsas

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**CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)**

Pursuant to L.R. D. Mass. 7.1(A)(2), I hereby certify that on May 29, 2008, I communicated with Plaintiff's Attorney, Andrew Stockwell-Alpert, regarding *Defendants Thomas Taylor and City of Boston's Motion for Extension* and he assented to this motion.

5/29/08

/s/ Helen G. Litsas

\_\_\_\_\_  
Date

\_\_\_\_\_  
Helen G. Litsas

**CERTIFICATE OF SERVICE**

I, Helen Litsas, Counsel for the City of Boston and Thomas Taylor, do hereby certify that on this day I filed a true copy of the attached documents via electronic filing and provided Plaintiff's counsel with a copy by facsimile and regular mail.

Dated: May 29, 2008

/s/ Helen G. Litsas

Helen G. Litsas